

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA

KIMBRELYN CHATMAN, on behalf  
of herself and others similarly situated  
Plaintiff,

v.

GC SERVICES LIMITED  
PARTNERSHIP,

Defendant.

C.A. No. 3:14-cv-00526-CMC

**PLAINTIFF’S SUPPLEMENT TO JOINT STATUS REPORT**

As directed by the Court, Plaintiff Kimbrellyn Chatman respectfully responds to the Court’s recent inquiry regarding the parties’ joint status report, submitted on April 1, 2015, Doc. 64, as follows:

On April 1, 2015, Ms. Chatman filed her petition, pursuant to Fed. R. Civ. P. 23(f), seeking interlocutory review of the Court’s order denying her renewed motion for class certification. Ms. Chatman respectfully submits that, pursuant to Fed. R. Civ. P. 23(f), the Court should stay the proceedings in this case pending a determination by the Fourth Circuit on Ms. Chatman’s petition for interlocutory review—a position GC did not oppose. *See* Doc. 64 at 1 (“Defendant agrees it would be appropriate to stay the case pending a ruling by the Fourth Circuit.”).

However, in light of GC’s concessions that it will not contest statutory damages to Ms. Chatman in the amount of \$1,000, nor will it oppose the recovery of Ms. Chatman’s statutory taxable costs, *see* Doc. 65 at 1, the remaining issues in this case have narrowed considerably. Thus, while Ms. Chatman still believes a brief stay until the Fourth Circuit decides whether to accept her 23(f) petition would conserve judicial resources, she is amenable to the issuance of a briefing schedule on her motion for final judgment and an award of attorney’s fees and costs. To that end,

and should the Court wish to address these issues now, Ms. Chatman respectfully requests 30 days within which to file her motion.

DATED: April 6, 2015

Respectfully submitted,

/s/ Holly E. Dowd  
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*Attorneys for Plaintiff Kimbrellyn Chatman*

### **CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing has been electronically filed on April 6, 2015 via the Court Clerk's CM/ECF system, which will provide notice to all counsel of record.

/s/ Holly E. Dowd  
Holly E. Dowd